

Dawn Kehoe-Roop, Corporate Representative

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

JOHN N. CASTELLANO, III,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case 4:19-CV-02304-SRC
	)	
VERNON BETTS, et al.,	)	
	)	
Defendants.	)	

ZOOM DEPOSITION OF CORPORATE REPRESENTATIVE DAWN  
KEHOE-ROOP

Taken on behalf of Plaintiff

October 2nd, 2020

Jo Ann Sturm, RPR, CSR, CCR  
REGISTERED PROFESSIONAL REPORTER  
ILLINOIS CSR NUMBER: 084-002267  
MISSOURI CCR NUMBER: 716

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**EXHIBIT  
DD**

## Dawn Kehoe-Roop, Corporate Representative

<p style="text-align: right;">Page 2</p> <p>1 INDEX OF EXAMINATION</p> <p>2</p> <p>3 DEPONENT CORPORATE REPRESENTATIVE DAWN KEHOE-ROOP</p> <p>4 Direct Examination By Ms. Petruska .....5</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1</p> <p>2 APPEARANCES</p> <p>3 The Plaintiff, JOHN N. CASTELLANO, III,</p> <p>4 was represented by Ms. Lynette M. Petruska of the law</p> <p>5 firm of Pleban &amp; Petruska, LLC, 2010 South Big Bend</p> <p>6 Boulevard, St. Louis, Missouri 63117.</p> <p>7 The Defendants, VERNON BETTS, et al.,</p> <p>8 were represented by Ms. Korey Lewis of the law firm of</p> <p>9 City Counselor's Office, 314 City Hall, St. Louis,</p> <p>10 Missouri 63103.</p> <p>11</p> <p>12 Also Present: Mr. John Castellano</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 3</p> <p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 EASTERN DISTRICT OF MISSOURI</p> <p>3 EASTERN DIVISION</p> <p>4</p> <p>5 JOHN N. CASTELLANO, III, )</p> <p>6 Plaintiff, )</p> <p>7 vs. ) Case 4:19-CV-02304-SRC</p> <p>8 )</p> <p>9 VERNON BETTS, et al., )</p> <p>10 Defendants. )</p> <p>11</p> <p>12</p> <p>13 ZOOM DEPOSITION OF CORPORATE REPRESENTATIVE</p> <p>14 DAWN KEHOE-ROOP, produced, sworn, and examined on</p> <p>15 behalf of the Plaintiff, on October 2nd, 2020,</p> <p>16 between the hours of 11:10 a.m. and 11:37 a.m. on that</p> <p>17 day before JO ANN STURM, a Registered Professional</p> <p>18 Reporter, an Illinois Certified Shorthand Reporter and</p> <p>19 a Certified Court Reporter within and for the County</p> <p>20 of St. Louis, State of Missouri.</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1 IT IS HEREBY STIPULATED AND AGREED by and</p> <p>2 between counsel for the Plaintiff and counsel for the</p> <p>3 Defendants that the deposition of CORPORATE</p> <p>4 REPRESENTATIVE DAWN KEHOE-ROOP may be taken in</p> <p>5 shorthand by Jo Ann Sturm, a Certified Court Reporter,</p> <p>6 and afterwards transcribed into typewriting, and the</p> <p>7 signature of the witness is waived by agreement of</p> <p>8 counsel and the witness.</p> <p>9 * * * * *</p> <p>10 MS. PETRUSKA: We have the same stipulation</p> <p>11 on remote through the entire designee deposition?</p> <p>12 MS. LEWIS: Absolutely.</p> <p>13 * * * * *</p> <p>14 CORPORATE REPRESENTATIVE DAWN KEHOE-ROOP,</p> <p>15 of lawful age, being produced, sworn, and examined on</p> <p>16 the part of the Plaintiff, and after responding "I do"</p> <p>17 to the oath administered by the court reporter,</p> <p>18 deposes and says:</p> <p>19 * * *</p> <p>20 DIRECT EXAMINATION</p> <p>21 BY MS. PETRUSKA</p> <p>22 Q Can you begin by stating your name for the</p> <p>23 record, please?</p> <p>24 A Lieutenant Dawn Kehoe-Roop.</p> <p>25 Q You understand you've been designated by the</p>

2 (Pages 2 to 5)

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<p style="text-align: right;">Page 10</p> <p>1 Let me ask you first, where did you get 2 those documents? 3 A I have them in my possession. I've kept 4 them as records since I started assisting with 5 training coordination efforts back in 2015. 6 Q So those are out of a file that you 7 maintain. 8 A Yes, ma'am. 9 Q And since 2015 when you -- 2015 is when you 10 became the training officer, training coordinator? 11 A It's when I started assisting with classes. 12 Between 2015 and 2016, Colonel Guzzy, Executive Aide 13 Guzzy, he was in and out a lot with medical issues, so 14 there were times I was going to have to fill in in his 15 capacity as it regards to training. So I would say 16 during those times we were filling in and assisting. 17 Q And I'm just asking because I know I asked 18 for records from 2015 to the present, so I wanted to 19 check and see if you had those responsibilities before 20 2015 and might have a longer set of files. But it 21 sounds like my time period and your starting period 22 for that position just happened to coincide some way. 23 A That is correct. I don't know of any that 24 existed. I was never turned over any that existed 25 before I started keeping these records.</p>	<p style="text-align: right;">Page 12</p> <p>1 Q So is it fair to say the training records 2 that you have to coordinate with the police 3 department, you have records only depending on how 4 cooperative the St. Louis police department is in 5 giving you a copy? 6 A That's true. Those are essentially their 7 records to keep on file. I always tried to just 8 maintain a copy as a point of reference. I could 9 always go over there and look something up if I needed 10 to, but some years I tried to maintain a copy. 11 Q It's my understanding that the sheriff's 12 department does new employee training; is that 13 correct? 14 A That's correct. 15 Q And then it also does internally certain 16 classes. In addition to the certifications you 17 mentioned, mace, Taser, weapons, in addition to that, 18 it also does like ongoing educational -- ongoing 19 education for the people inside the sheriff's 20 department, correct? 21 A Are you speaking of specialty or are you 22 speaking of actual what we consider academy training? 23 Q I'm assuming if it's academy training it 24 would be for new employees; is that correct? 25 A Academy training is for new employees, yes.</p>
<p style="text-align: right;">Page 11</p> <p>1 Q Fair enough. And we only asked her from 2 2015 anyway. 3 Would you have a copy of any training that 4 took place in the sheriff's department? 5 A Well, if it was specialty training, and when 6 I say specialty I mean OC, I mean Taser, those records 7 are kept by those instructors. So for the first 8 couple of years when I was an OC instructor, I would 9 have some of those records. But I'm no longer, so for 10 the past few years it's been Sergeant Haill and 11 Sergeant Buchanan, they would have those records. 12 As far as Taser, I was never a Taser 13 instructor, so they actually keep those records. The 14 only thing that I input are the dates that they were 15 certified in the computer system. 16 Q So if the sheriff's department is doing a 17 training through the St. Louis police department in 18 some of those areas you mentioned before, I think like 19 racial sensitivity or defensive tactics, do you keep a 20 sign-in sheet for that like the sign-in sheets I saw? 21 A The police department keeps those sheets. 22 When I became the coordinator, I tried to get copies, 23 so there are some which I think I submitted to you 24 from maybe 2017 that had those classes, but I didn't 25 always have those copies.</p>	<p style="text-align: right;">Page 13</p> <p>1 Q Let me ask it this way: The records that 2 were produced to me, is that all for new employees 3 only? 4 A Yes. 5 Q So the records I have only relate to new 6 employee training. To the extent that there's ongoing 7 training for deputies, I don't have those records 8 because I didn't ask for it, is that fair to say? 9 A Correct. I was only going by what it 10 stated, for the new hires I believe it said. 11 Q And that is exactly what it said, but I 12 wanted to get clarification if I got all the records 13 or if I got some because some lists were very, very 14 short and some lists were very, very long, so I 15 couldn't tell if there was a generalized deputy 16 training. 17 A Some of those there were page twos. I 18 thought you just needed the instructor -- 19 Q Yeah, no, no -- 20 A -- the employees. So some lists are going 21 to be longer than others, depending on how many we had 22 that actually attended. 23 Q So the length of a list -- right. One of 24 them might have three people on it and I assume that 25 was a new employee because I saw like the same three</p>